SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

FOUR TIMES SQUARE NEW YORK 10036-6522

> TEL: (212) 735-3000 FAX: (212) 735-2000 www.skadden.com

DIRECT DIAL
(2 | 2) 735-7852
DIRECT FAX
(2 | 2) 777-7852
EMAIL ADDRESS
SCOTT.MUSOFF@SKADDEN.COM

July 13, 2012

FIRM/AFFILIATE OFFICES BOSTON CHICAGO HOUSTON LOS ANGELES PALO ALTO SHINGTON, D.C. WILMINGTON BEIJING BRUSSELS FRANKFURT HONG KONG LONDON MUNICH PARIS SÃO PAULO SHANGHAI SINGAPORE TOKYO

By Email (CrottyNYSDChambers@nysd.uscourts.gov)

Hon. Paul A. Crotty, U.S.D.J.
United States District Court for the Southern District of New York
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7-11-12

RE: Norcast S.àr.l. v. Castle Harlan, Inc., Civ. No. 12-4973

Dear Judge Crotty:

We represent Defendant Castle Harlan, Inc. ("Castle Harlan") in the above-referenced matter. Pursuant to Your Order dated July 11, 2012, we have met and conferred with counsel for Plaintiff Norcast S.àr.l. ("Norcast") and jointly propose the following briefing schedule for Castle Harlan's contemplated motion to dismiss and/or stay in favor of arbitration and Norcast's contemplated motion to remand:

July 18 Castle Harlan serves/files motion to dismiss and/or stay in favor of arbitration

August 6 Norcast serves/files motion to remand and opposition to motion to dismiss

August 17 Castle Harlan serves/files opposition to motion to remand and reply in further support of motion to dismiss

August 27 Norcast serves/files reply in further support of motion to remand

As stated in the Order, all other dispositive motions will be held in abeyance pending the Court's ruling on these motions.



Hon. Paul A. Crotty, U.S.D.J. July 13, 2012 Page 2

The parties also propose that each be permitted to file a total of 50 pages, to be split in any fashion between each party's two briefs.

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Respectfully submitted,

Scott D. Musoff /ca

cc: Scott Balber, Esq./Jonathan Cross Esq. (by email)

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HON. PAUL A. CROTTY

UNITED STATES DISTRICT JUDGE